

Paul Carlos Southwick (OSB 095141)
TRIAL ATTORNEY
Religious Exemption Accountability Project
Paul Southwick Law, LLC
8532 N. Ivanhoe St. #208
Portland, OR 97203
Email: paul@paulsouthwick.com
Phone: 503-806-9517

Timothy R. Volpert (OSB 814074)
Tim Volpert PC
2111 NE Hancock St. Ste. 2B
Portland, OR 97212
Email: tim@timvolpertlaw.com
Phone: 503-703-9054

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
EUGENE DIVISION**

Elizabeth HUNTER; et al., on behalf of)
themselves and all others similarly situated,)
)
) Plaintiffs,)
)
) v.)
)
) U.S. DEPARTMENT OF EDUCATION and)
) Suzanne GOLDBERG, in her official capacity as)
) Acting Assistant Secretary for Civil Rights,)
) U.S. Department of Education,)
)
) Defendants.)

Case No. 6:21-cv-00474-AA

**DECLARATION OF JAMIE
LORD IN SUPPORT OF
MOTION TO AMEND
MOTION FOR
TRO/PRELIMINARY
INJUNCTION**

I, Jamie Lord, declare:

- 1. I am over 18 years of age and have personal knowledge of the matters stated in this declaration and would testify truthfully to them if called upon to do so.
- 2. It hit me like a brick wall when it finally set back in that I had to start the semester again. I started classes yesterday and I've been in a very emotional place. I already feel burnt out after day one.
- 3. I know people are talking about me and asking about what I'm doing. Everyone knows about my situation. I feel like I am under a microscope.

4. During Zoom class yesterday, my first day of class, I felt targeted. Within ten minutes of class, the professor gave a speech about the rights of “Christian” lawyers to reject LGBTQ people. The Professor said: “if you don’t want to see a homosexual client, then you don’t have to see a homosexual.”
5. I immediately had to leave the Zoom room. People in class texted me immediately to ask if I was okay because they knew I was being targeted. The faculty is coming after me and trying to embarrass me in front of everyone.
6. Law school is hard enough without all of this pressure and not knowing if Title IX is going to protect me. I feel so distraught. I am anxious. I am dealing with panic attacks for the first time.
7. I feel like I don’t have any protections at the school and that nobody cares. We need protections now that we are known about, and now that people are coming after us. Having Title IX protection is the only reason the school will take me seriously. I don’t have anyone else on my side

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct, and that this declaration was executed this 24th day of August, 2021.

By: s/ Jamie Lord
Jamie Lord